

UNITED STATES DISTRICT COURT
 for the
Eastern District of Pennsylvania

United States of America)
 v.)
 WARREN HENDERSON) Case No. 18-1425-M
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Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 5, 2018 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 2113(a) (2 Counts)

Knowingly and unlawfully by force and violence, and by intimidation, took, and attempted to take, from employees of Bank of America and M&T Bank, lawful currency of the United States, belonging to, and in the care, custody, control, management, and possession of the Bank of America and M&T Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

This criminal complaint is based on these facts:

Please refer to the attached affidavit.

Continued on the attached sheet.

faith E. Greenawalt
 Complainant's signature

faith E. Greenawalt, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Judge Rice authorized agent to sign (FA)

Date: 09/08/2018

Timothy R. Rice 12:38 p.m.
 Judge's signature

City and state: Philadelphia, Pennsylvania

Honorable Timothy R. Rice

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Faith E. Greenawalt, being duly sworn under oath and deposed, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Philadelphia, Pennsylvania Division, and have been so since July 2013. I am currently assigned to the Violent Crimes Task Force (VCTF) which investigates violations of Federal law, to include robberies of banks, robberies of businesses that affect interstate commerce (also known as Hobbs Act robberies), kidnappings, and fugitives. Previously, I was assigned to the Counterintelligence squad where I investigated Counter Proliferation, among other violations of federal law.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging WARREN HENDERSON, date of birth (DOB) [REDACTED] with violations of Title 18, United States Code, Section 2113(a) (bank robbery and attempted bank robbery).

3. On Wednesday, September 5, 2018, at approximately 9:30 a.m., an unknown black male, hereinafter referred to as suspect, attempted to rob Bank of America, located at 1600 N. Broad Street, Philadelphia, Pennsylvania. The suspect entered the bank branch and approached the victim teller who was with another customer. Once the customer walked away from the counter, the suspect walked directly to the teller window and threw a Merrick Bank Debit Card on the counter. The Merrick Bank Debit Card had “JALIL WRIGHT” and “4490 1100 0903 1769” on the front of the card. The suspect then slid a demand note under the glass partition which read, “This is a hold up Put money in bag No Die Pack.” The victim teller read the note and looked up at the suspect. The suspect then stated, “Put it in the bag.” The victim teller told the suspect she did not have a bag. The suspect then stated, “I have a gun under the

counter. I will shoot you. You don't want to get anyone hurt." The victim teller then pressed the alarm and called out to her manager. The manager walked over to the victim teller's counter and read the note. The victim teller and manager then walked away from the counter and hid behind the teller station. The victim teller did not comply with the demands of the suspect. The suspect then departed the bank branch empty-handed and traveled in an unknown direction, successfully fleeing the scene of the attempted robbery.

4. After the attempted robbery, Philadelphia Police Department Officers, Temple University Police Officers and Detectives, and members of the Philadelphia Division Violent Crimes Task Force responded to the crime scene for investigation and processing of the scene. Once on scene, the victim teller was interviewed, video surveillance footage was obtained, and the original demand note and the debit card were recovered.

5. The suspect was described as a black male, 40s to 50s in age, approximately 5'6" to 5'7" in height, skinny build, white scruff on his face, wearing a black hooded sweatshirt, and light blue baseball cap with an orange "S" on the front.

6. Later that same day, at approximately 10:10 a.m., an unknown black male, hereinafter referred to as suspect, robbed the M&T BANK, located at 3351 Aramingo Avenue, Philadelphia, Pennsylvania. The suspect entered the bank branch and approached the victim teller. The suspect slid a demand note under the counter that stated, "Hold up Armed Just Pass the money No one will get hurt." The victim teller told the suspect she had nothing for him because she could not remember the pass code to the Teller Cash Recycle machine. The suspect then stated, "Don't play with me because I'm going to hurt somebody." The victim teller complied with the suspect's demands and provided approximately \$467 United States Currency, which included a dye pack and bait money. The bait money provided totaled \$250 U.S.C. (\$200

in \$10 dollar bills and one \$50 bill) and the dye pack contained \$80 U.S.C. (four \$20 dollar bills). The victim teller then pressed the alarm button. The suspect then departed the bank branch with the money and traveled in an unknown direction, successfully fleeing from the scene of the robbery.

7. After the robbery, Philadelphia Police Department Officers and Detectives and members of the Philadelphia Division Violent Crimes Task Force responded to the crime scene for investigation and processing of the scene. Once on scene, witnesses and the victim were interviewed, video surveillance footage was obtained, and the original demand note was recovered.

8. The suspect was described as a black male, late 40s to early 50s in age, 5'6" to 5'7" in height, skinny build, light grey beard, wearing a white t-shirt, and a blue baseball cap with an orange logo on the front.

9. On September 6, 2018, Detective Aitken, Temple Police Department, who had responded to the Bank of America attempted bank robbery on September 5, 2018, contacted your affiant. Detective Aitken provided your affiant with surveillance photographs of the get-away vehicle used during Bank of America attempted bank robbery. Detective Aitken provided the vehicle information as a gold in color, Chrysler 200, Pennsylvania tag KME7241.

10. Investigators conducted database checks for PA tag KME7241, identifying the owner of the vehicle as Willette Devine-Henderson, home address 154 W. Spencer Street, Philadelphia, Pennsylvania.

11. On September 7, 2018, the VCTF responded to the 100 block of Spencer Street and observed a gold Chrysler, bearing PA tag KME7241 parked on the street. Surveillance was initiated and a black female, later identified as Willette Devine-Henderson, walked to the

vehicle, opened the vehicle, and retrieved property from the vehicle. Devine-Henderson then walked into the residence at 154 W. Spencer Street, Philadelphia, PA. Task Force Officers (TFO) Drumm and Smith knocked on the door of 154 W. Spencer Street and made contact with Devine-Henderson. Devine-Henderson stated the Chrysler was her vehicle and that she was the only person operating the vehicle in the last few days. Devine-Henderson was then shown a single surveillance photograph from the Bank of America attempted bank robbery and asked if she recognized the individual depicted in the photograph. Devine-Henderson immediately identified the individual in the surveillance photograph as her ex-husband, WARREN HENDERSON.

12. Devine-Henderson stated WARREN HENDERSON has a drug problem and was currently residing at her mother's residence, located at the Mt. Vernon Garden Apartments, 875 Easton Road, 1st Floor.

13. The VCTF then followed Devine-Henderson and her mother to the apartment. Devine-Henderson's mother unlocked and entered the apartment and brought the TFOs inside the apartment where they observed WARREN HENDERSON. The TFOs identified themselves and WARREN HENDERSON stated, "I fucked up. I have a bad habit. I don't want any trouble."

14. WARREN HENDERSON was then transported to the Philadelphia Division of the FBI, 600 Arch Street, 8th Floor, Philadelphia, PA, for further investigation. Upon arrival, WARREN HENDERSON was advised of his Miranda rights, via an FBI Advice of Rights form, which he subsequently signed and dated. WARREN HENDERSON then provided a full confession to the September 5, 2018 attempted robbery of Bank of America, located at 1600 N. Broad Street, Philadelphia, PA, and the September 5, 2018 robbery of M&T Bank, located at 3351 Aramingo Avenue, Philadelphia, PA. The interview of WARREN HENDERSON was visually and audibly recorded.

15. At the conclusion of the interview, WARREN HENDERSON was shown an FBI Wanted Flyer from the aforementioned attempted bank robbery and bank robbery discussed herein. WARREN HENDERSON positively identified himself as the individual depicted in the surveillance photographs from the aforementioned bank robberies. WARREN HENDERSON then signed and dated the FBI Wanted Flyer acknowledging that he was the person depicted in the photographs. WARREN HENDERSON was also shown a copy of the demand note and debit card used during the Bank of America attempted robbery. WARREN HENDERSON admitted he wrote the demand note and admitted he used the debit card during the commission of the attempted bank robbery at Bank of America. WARREN HENDERSON subsequently signed and dated the demand note and the debit card acknowledging that he used these items during the aforementioned attempted robbery. WARREN HENDERSON was also shown the demand note recovered from the M&T bank robbery, which he admitted he wrote. WARREN HENDERSON signed and dated the demand note used during the M&T Bank robbery, acknowledging that he used this item during the robbery.

16. WARREN HENDERSON told investigators he wrapped the dye pack in a plastic bag and threw it in a garage three or four houses down from 154 W. Spencer Street, Philadelphia, PA. Investigators then traveled to that location and recovered the dye pack in the garage of 142 W. Spencer Street, Philadelphia, PA.

17. WARREN HENDERSON was then processed and transported into the custody of the Bureau of Prisons at the Federal Detention Center Philadelphia.

18. Devine-Henderson told investigators she would accompany them to FBI Philadelphia and provide a statement. Devine-Henderson was interviewed by your affiant, which was visually and audibly recorded. During the interview, Devine-Henderson was shown a copy

of the FBI Wanted Flyer from the September 5, 2018 attempted bank robber and bank robbery. Devine-Henderson immediately identified the individual depicted in the surveillance photographs as WARREN HENDERSON. Devine-Henderson subsequently signed and dated the Wanted Flyer acknowledging that WARREN HENDERSON was the person depicted in the photographs. Devine-Henderson also admitted she drove WARREN HENDERSON to both banks on September 5, 2018 in the Gold Chrysler, though she did not know WARREN HENDERSON planned on robbing either bank. Devine-Henderson stated after she drove WARREN HENDERSON to Bank of America, WARREN HENDERSON entered her vehicle and said he needed to go to an M&T Bank. Devine-Henderson then searched her cellular telephone, associated with telephone number 267-366-4684, for the nearest M&T Bank. The search identified M&T Bank, 3351 Aramingo Avenue, Philadelphia, Pennsylvania. On the drive to M&T Bank, WARREN HENDERSON told Devine-Henderson he needed to throw his hooded sweatshirt away because it had bed bugs. WARREN HENDERSON then took his hooded sweatshirt off and placed it in a plastic bag. Devine-Henderson could not remember where WARREN HENDERSON disposed of the hooded sweatshirt but knew he threw it away.

19. Devine-Henderson dropped WARREN HENDERSON off at M&T Bank, 3351 Aramingo Avenue, Philadelphia, Pennsylvania, and went next door to shop. When Devine-Henderson and WARREN HENDERSON returned to the Chrysler, WARREN HENDERSON had a stack of cash. WARREN HENDERSON took the loose bills off of the top of the stack and placed the stack inside the center console. Devine-Henderson did not know where the cash from the console went but believed WARREN HENDERSON threw it away.

20. At the conclusion of the interview, Devine-Warren provided written and verbal consent for the search of her cellular telephone. A search of her telephone identified a Google search for M&T Bank, 3351 Aramingo Avenue, Philadelphia, Pennsylvania.

21. Investigators conducted database checks for WARREN HENDERSON, to include prior arrests, criminal history, and a driver's license check.

22. Investigators compared the driver's license photograph of WARREN HENDERSON with the surveillance photographs from the September 5, 2018 attempted bank robbery at Bank of America, 1600 N. Broad Street, Philadelphia, Pennsylvania, and the September 5, 2018 robbery at M&T Bank, 3351 Aramingo Avenue, Philadelphia, Pennsylvania. The comparison showed that the individual depicted in the surveillance photographs is WARREN HENDERSON.

23. Your affiant has compared the physical appearance and description of WARREN HENDERSON with that of the physical description provided by bank employees. Investigators believe WARREN HENDERSON fits the physical descriptions provided by the bank employees at Bank of America and M&T Bank.

24. The deposits of the Bank of America and M&T Bank are insured by the Federal Deposit Insurance Corporation (FDIC) and were insured by the FDIC at the time of the aforementioned attempted robbery and robbery described above.

25. Based on all of the aforementioned information, your affiant believes there is probable cause to charge WARREN HENDERSON with the September 5, 2018 attempted bank robbery of the Bank of America, located at 1600 N. Broad Street, Philadelphia, Pennsylvania, and the September 5, 2018 robbery of the M&T Bank, 3351 Aramingo Avenue, Philadelphia,

Pennsylvania, in violation of Title 18, United States Code, Section 2113(a).

faith e. greenawalt
FAITH E. GREENAWALT
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 8 day of
September, 2018

Judge Rice authorized agent to sign.

Timothy R. Rice 12:38 p.m.
HONORABLE TIMOTHY R. RICE
United States Magistrate Judge